

DRAFT

Dr. Frederick Dowsett, PhD, Unit Leader
Hazardous Material and
Waste Management Division
Colorado Department of Health
4210 East 11th Avenue
Denver, Colorado 80220-3716

OCTOBER 1, 1992 PROGRESS REPORT

Dear Dr. Dowsett:

This progress report, submitted in accordance with the Settlement Agreement and Compliance Order on Consent No. 89-10-30-01, provides the status of deliverables and mixed residue compliance requirements identified in and resulting from the Settlement Agreement and Compliance Order No. 89-10-30-01 and the amended Compliance Order No. 91-07-31-01 (currently in negotiation). This progress report specifically references those requirements which were scheduled for completion between September 1, 1992 and October 1, 1992.

1. In the past DOE has requested that EG&G evaluate the need for secondary containment in all residue storage areas. According to the Colorado Hazardous Waste Regulations (6 CCR 1007-3) secondary containment for container storage areas in buildings is required only if free liquids or EPA codes F020, F021, F022, F026, and F027 are being stored. A process knowledge evaluation of IDCs for free liquids was provided to operations managers.
2. The following progress has been made on commitments identified in the Revised Mixed Residue Tank Systems Management Plan (the plan) dated August 13, 1992:
 - a. Tank D-160A was drained a second time on September 16, 1992 to remove any residual liquid that may have been heldup on the raschig rings. This tank is considered physically empty and has been taken out of service and will not be used unless it is repaired.
 - b. Closure plans for category A and C tanks in Building 371 were submitted to CDH on September 13, 1992 as specified in the plan. The closure plans for the Building 771 category C tanks are in progress and are expected to be submitted to DOE for review on November 13, 1992.
 - c. A letter was submitted to CDH by September 13, 1992 identifying the options to empty category B tanks and providing a date when schedules for emptying can be provided. This letter states that a schedule for emptying tanks will be provided by June 30, 1993.

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- d. It was determined that the release from ancillary equipment associated with tanks D-400A and D-400C, located in Building 371, is apparently from a valve and not from the blanked flange as initially projected in the RCRA Contingency Plan Implementation Report No. 92-010. This will require draining the ancillary equipment prior to making any necessary repairs. This project is still expected to be completed by November 6, 1992.
3. On an existing air-head sampler was located in room 152, Building 776 behind equipment installed to upgrade this storage area. This air-head was then put back in service on September 1, 1992. Building 776 now meets the back-up monitoring requirements with a SAAM and a fixed air-head sampler.

The installation of back-up monitoring equipment in Building 779 is due to be completed on November 1, 1992. The subcontractor is preparing for the project and work is expected to start October 16, 1992.
4. The sampling and analysis plan for pyrochemical salts is now in the review phase and is expected to be delivered to DOE by October 5, 1992.
5. Preparation of the Annual Mixed Residue Reduction Report is currently in progress. A draft is expected to be delivered to DOE for review by October 13, 1992. It is still expected that the final report will be delivered to CDH by November 13, 1992 as specified in the amended Compliance Order No. 91-07-31-01.
6. The following items have been completed or are in progress concerning the Building 771 Stabilization Program Plan - Phase I.

Solutions in Bottles

- a. Preparation and approval of Task Information Packages (TIPs) is still in progress.
- b. The sampling and analysis plan for the Building 771 Stabilization Program has been completed and approved. The plan is ready for implementation. Five bottles (bottles currently located in gloveboxes) have been sampled; however, the analysis cannot be performed at this time as the laboratory preparation and equipment certification is not complete.
- c. As of the morning of October 1, 1992 the following bottle movements have been made: 84 bottles were taken out of drums (six drums each containing 14 bottles) in Building 771 and were placed in gloveboxes in Building 771. The distribution of bottles is as follows:

Room	Glovebox	# of Bottles
180F	F60	34
180K	K30	34
163	112	5
163	115	3
164	72	2
164	74	3
149	CCC*	3

- * three bottles are being stored in the contamination control cell (CCC) until Nuclear Materials Safety Limits are issued.

Bottle movements occurred on the following dates: September 24 - 2 drums (28 bottles), September 29 - 2 drums (28 bottles), September 30 - 1 drum (14 bottles) and October 1 - 1 drum (14 bottles). Additional bottle movements are planned for October and will be reported in the next monthly progress report.

- Engineering and maintenance work is progressing on the work orders identified for this operation. In order to complete the training of laboratory personnel and to qualify laboratory equipment some work orders still need to be completed.

Chemical Stabilization

There are 31 unknown chemicals in need of analysis prior to bringing in a subcontractor to perform the chemical stabilization. Concurrently security issues are being addressed for the upcoming chemical stabilization effort that will begin following the evaluation of the 31 unknown chemicals. The analyses are planned for mid-November in the labs in Buildings 771 and 559.

Resin Removal

Sampling and removal of resins cannot proceed until the TIP is approved and Nuclear Materials Safety Limits for resin sampling and removal are received. Both these tasks are currently in progress.

If you have any questions concerning this progress report, please contact Warren Seyfert of my staff at 966-5925 or Judy Henderson of EG&G Rocky Flats, Inc. at 966-3821.

cc:

S. A. Anderson, EG&G Rocky Flats, Inc.
J. E. Joyce, EG&G Rocky Flats, Inc.
J. L. Henderson, EG&G Rocky Flats, Inc.